

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION**

Michael K. Gregory,)	
)	
Plaintiff,)	
)	No. 3:18-cv-00444-PPS-MGG
v.)	
)	
K. Zimmerman et al.,)	Judge Philip P. Simon
)	
Defendants,)	Magistrate Judge Michael G. Gotsch,
)	Sr.
)	
)	

JOINT STATUS REPORT

Pursuant to Magistrate Judge Gotsch's February 12, 2021 Order, Plaintiff Michael Gregory and Defendants Steven Beach, Matthew Florer, Andres Lagunas, Michael Maldonado, Courtney Woolfork, and Kirk Zimmerman, by their undersigned counsel, submit the following joint status report regarding discovery in this litigation going forward.

1. On September 11, 2020, the parties filed a Joint Motion to Stay this proceeding. (Dkt. 94) On September 14, 2020, the Court granted the motion. (Dkt. 95)
2. At the time the Joint Motion to Stay was granted, the below deadlines regarding discovery were in place:
 - a. Deadline for completion of written discovery: October 5, 2020;
 - b. Deadline for completion of depositions of fact witnesses: November 2, 2020;
 - c. Deadline to serve expert witness reports: November 30, 2020;
 - d. Deadline to complete expert discovery: December 28, 2020.

(Dkt. 93)

3. On February 11, 2021, the Plaintiff filed an Unopposed Motion to Lift Stay of Litigation. (Dkt. 100) On February 12, 2021, the Court granted the motion and directed the parties to meet and confer and file a joint status report proposing a plan for managing discovery and any other matters in this litigation going forward. (Dkt. 101)

4. On February 22, 2021, counsel for the parties met and conferred regarding discovery in this matter. Counsel discussed certain outstanding written discovery responses and agreed upon a date by which those responses will be exchanged. Counsel also discussed the remaining discovery schedule in the case. The parties jointly propose the following deadlines:

- a. Deadline for completion of written discovery: April 30, 2021;
- b. Deadline for completion of depositions of fact witnesses: July 30, 2021;
- c. Deadline to serve expert witness reports: August 31, 2021;
- d. Deadline to complete expert discovery: September 30, 2021.

5. On February 24, 2021, lead counsel for the defendants moved to withdraw his appearance and a new lead counsel filed an appearance on behalf of the defendants. (Dkts. 102-104)

6. The parties respectfully request that the Court enter a revised scheduling order in this case with the above discovery deadlines.

Dated: March 1, 2021

Respectfully Submitted,

/s/ Keri Holleb Hotaling

Keri Holleb Hotaling
Alisa Finelli (*pro hac vice*)
Charles Carlin (*pro hac vice*)
Jenner & Block LLP

353 North Clark Street
Chicago, IL 60654
Telephone: (312) 923-2631
Fax: (312) 527-0484

Attorneys for Plaintiff

Todd Rokita
Attorney General of Indiana
Attorney No. 13999-20

/s/ Molly M. McCann (with permission)
Molly M. McCann
Deputy Attorney General of Indiana
Attorney No. 35969-49

Attorneys for Defendants